

From: [ANDERSON Jim M](#)
To: [Chip Humphrey](#)
Subject: Fw: PO Bar dredging
Date: 06/02/2010 09:21 AM

[attachment "PO Bar PRG determination.pdf" deleted by Chip Humphrey/R10/USEPA/US]
[attachment "PO Bar NMFS BO Conditions.pdf" deleted by Chip Humphrey/R10/USEPA/US]
[Chip](#),
[Alex had your address wrong.](#)
[Jim](#)

From: LIVERMAN Alex
To: ANDERSON Jim M; freedman.jonathan@epa.gov ; 'humphries.chip@epa.gov'
Sent: Wed Jun 02 09:13:40 2010
Subject: PO Bar dredging

Hiya!

Hope you all are well. Thanks again for your participation in our meeting last month with the Corps on the need for coordination among us all on dredging projects in the Portland Harbor superfund site.

This afternoon, we will participate in our first coordination meeting on several projects being considered for Corps Regulatory permits to dredge. As T-5 is our highest priority, I intend to hash this one out today. The proposed Corps action to dredge the navigation channel at PO Bar has some similarities to T-5. As you know, though, the Corps does not regulate itself, so the PO Bar proposal will not be discussed at the coordination meeting.

As the Corps is very interested in undertaking this project during the upcoming in-water work window (July 1-Oct 31), I have been coordinating with NMFS on suitable conditions to impose through the NMFS' BO and the DEQ 401 WQC. While NMFS did incorporate many of my suggestions in their BO (issued May 13, 2010) such that most monitoring will line up, I have concerns with the allowable exposure durations of PCBs & DDT (& cadmium and zinc to a lesser extent) at higher concentrations than are present on the existing surface.

I am attaching an excerpt of the BO so you can review the conditions (condition 1. i. i., in particular) and also the PRG determination from June 2009 which includes the magnitude of increase in pollutant levels. My read is that these higher levels will be exposed

for a minimum of 6 months and as much as 20 months before capping could be completed, and effectiveness of capping is suspect.

As we discussed at meetings with the Corps on the SEF issues last summer, the PRG document reflects that coordination with EPA on these issues was essential. As this has not occurred, I am trying to insure that we do so now during the development of the 401 WQC. My main dilemma is whether EPA and DEQ would agree that the NMFS monitoring, containment, and contingency measures are adequate, or whether we should impose more stringent conditions in the 401 WQC conditions. So...

- 1) Do you think 6-20 months of exposure at these levels is ok?
- 2) Do you think 2 inches of natural accumulation in 6 months is adequate to keep these higher levels from mobilizing?
- 3) If a 6 inch sand cap is placed, do you think this is adequate to keep higher levels from being mobilized, esp. in consideration of the Corps' belief that a 6 inch sand cap is not effective in the dynamic setting of the well-used navigation channel?
- 4) Are there definitive techniques for measuring 2 in to 6 in of natural accumulation in the navigation channel? I worry that bathymetry comparisons have too much error to detect so small a change and that sand traps are not representative of the whole area. Other complications could also render such monitoring ineffective and then what do we do?
- 5) Do you share my concern that the hottest PCB area in the harbor is located adjacent to the proposed dredging area and that dredging there may cause this to slough into the navigation channel causing significantly higher levels of PCBs and ready mobilization?

Could we have some discussions on these issues and how we might agree to resolve them? I need some guidance on writing appropriate conditions for monitoring and contingencies, etc. and how to capture risk management options, etc. (For instance, the benthic sampling (condition 1.b.) and sediment deposition monitoring need more specificity).

The Corps is targeting Sep to do this dredging, which means I must have the draft decision out on public notice no later than July 16th. Unfortunately, I am out June 7-11 and 15-18. If we could coordinate on these issues this week and in the last weeks of June, that would be very helpful.

<<PO Bar NMFS BO Conditions.pdf>> <<PO Bar PRG determination.pdf>>

Thanks and I look forward to your comments, suggestions and discussions.

--Alex

L. Alexandra Liverman

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Got questions about the 401 WQC process? Check out DEQ's new 401 Certification website at: <http://www.deq.state.or.us/wq/sec401cert/sec401cert.htm>